



Exhibit 1

K. Chad Burgess
Director & Deputy General Counsel

chad.burgess@scana.com

December 1, 2017

VIA ELECTRONIC MAIL
AND U.S. FIRST CLASS MAIL

Robert Guild, Esquire
314 Pall Mall
Columbia, SC 29201
bguild@mindspring.com

Re: Friends of the Earth and Sierra Club v. SCE&G, Prudence of South Carolina Electric & Gas Company Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina and the Unjust and Unreasonable Rates Related Thereto
Docket No. 2017-207-E

Dear Bob:

The FTP site listed below contains a production bearing bates numbers FOE0000001 – FOE0000896 produced in response to Defendant/Respondent's Responses and Objections to Complainants' First and Second Set of Interrogatories, Document Production Requests, and Request for Entry in the above referenced matter. The username needed to access these files is also below. The password will be sent to you under separate cover. These documents are produced subject to Defendant/Respondent's objections to the Requests. Please note that certain of these documents are marked "Confidential" and should be treated as such.

We are producing documents responsive to the Requests on a rolling basis. Production of additional documents determined to be responsive to the Requests will follow at a later date.

FTP Site: <https://kingspalding.ftptoday.com>

Username: bguild@mindspring.com

If you have any questions or trouble accessing the site, please do not to hesitate to contact us.

Very truly yours,

K. Chad Burgess

KCB/kms
Enclosures

**BEFORE
THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2017-207-E**

In Re: Friends of the Earth and Sierra Club,)
Complainants/Petitioners,)
)
v.)
)
South Carolina Electric & Gas Co.,)
Defendant/Respondent.)

**DEFENDANT/RESPONDENT'S RESPONSES AND OBJECTIONS TO
COMPLAINANTS' FIRST INTERROGATORIES, DOCUMENT
PRODUCTION REQUESTS AND REQUEST FOR ENTRY**

Defendant/Respondent South Carolina Electric & Gas Co. ("SCE&G"), pursuant to Rules 33 and 34 of the South Carolina Rules of Civil Procedure and Chapter 103, Article 8 of the South Carolina Code of Regulations, serves its Responses and Objections to Complainants' First Interrogatories, Document Production Requests and Request for Entry as follows (the "Requests").

TERMS OF RESPONSE

1. These responses reflect SCE&G's information and belief as of the date on which these responses and objections are made and may be subject to change or modification based on further discovery or on facts or circumstances which may come to SCE&G's attention at a later time. Accordingly, SCE&G reserves the right to supplement, revise, correct, clarify, or otherwise modify its responses and objections to the Requests. SCE&G also reserves the right to assert any other applicable objections to the Requests and to object to any other demands relating to the subject matter of the responses herein. SCE&G's responses to the Requests are not intended to constitute a waiver of any rights or objections.

2. By responding to the Requests, SCE&G does not concede that the Requests seek information that is relevant or admissible in the prosecution or defense of the Action. By providing

information in response to the Requests, SCE&G does not waive, and expressly reserves, all objections with respect to such information.

3. SCE&G's assertion that it will produce documents in response to a particular Request is not to be construed as an admission that any document exists within any requested category or categories, but solely as an assertion that SCE&G will produce (consistent with the objections and limitations raised herein or hereafter) any non-privileged, relevant, responsive documents or information within its possession, custody, or control that can be located after a reasonable search. SCE&G expressly reserves the right to redact irrelevant or privileged portions of documents produced in response to the Requests.

4. Certain documents in SCE&G's possession, custody, or control were obtained and are maintained by SCE&G pursuant to agreements with third parties that designate the information as confidential and proprietary and restrict SCE&G's ability to freely produce information without protections on the dissemination and use of such information. Thus, the disclosure of this information as well as other information that is non-public, confidential, sensitive, or would otherwise cause injury to SCE&G if publicly disclosed will not be produced until the parties execute a mutually agreeable protective order.

GENERAL OBJECTIONS

1. SCE&G objects to Complainants' Request that they and their agents be permitted entry upon the lands and premises which are the location of the subject facility for purposes of inspection, measuring, surveying, photographing, testing, or sampling.

2. SCE&G objects to the Requests to the extent that they seek to impose requirements or obligations different from or beyond those imposed by the South Carolina Rules of Civil Procedure and Chapter 103, Article 8 of the South Carolina Code of Regulations.

3. SCE&G objects to each definition, instruction, and Request to the extent compliance with the Request would impose an undue burden on SCE&G or compliance would be oppressive or unduly expensive, given the claims or defenses at issue in the Action.

4. SCE&G objects to the Requests to the extent that they seek documents and information not in its possession, custody or control. For purposes of its responses, it is SCE&G's position that materials in the possession of any independent, third party advisors, including its attorneys, consultants, or representatives, are not within SCE&G's possession, custody or control.

5. SCE&G objects to the Requests to the extent they seek information that is within Complainants' knowledge or possession or to which Complainants have equal access.

6. SCE&G objects to each of the Requests to the extent they seek information protected by the attorney-client privilege, the work product doctrine, the joint defense privilege, any privilege under Rule 26 of the South Carolina Rules of Civil Procedure, or any other applicable privilege. SCE&G reserves the right to waive any such privileges in the future and will notify Complainants if and when SCE&G does so. Inadvertent disclosure of any privileged or otherwise protected information shall not constitute a waiver of any claim of privilege. SCE&G hereby requests the return of any such inadvertently produced privileged information and reserves the right to object to the disclosure or use of such privileged information at any stage of these or any other proceedings.

7. SCE&G objects to the Requests to the extent they seek to impose a continuing obligation on SCE&G.

8. SCE&G objects to the Requests to the extent they seek information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence.

9. SCE&G objects to the Requests to the extent they seek information not ascertainable by a reasonably diligent search for responsive information. SCE&G objects to the Requests to the extent the Requests seek "all" documents because SCE&G cannot guarantee that it has located every single document responsive to the Request. Consistent with its obligations under the South Carolina Rules of Civil Procedure and Chapter 103, Article 8 of the South Carolina Code of Regulations, SCE&G will make a diligent, good faith search for documents and will produce responsive, non-privileged documents, to the extent they exist, and/or provide information, located in connection therewith. To that end, SCE&G is willing to meet and confer to discuss these Responses and Objections.

10. SCE&G fully incorporates its General Objections into its responses below.

SPECIFIC RESPONSES AND OBJECTIONS

REQUEST FOR PRODUCTION NO. 1:

All documents relating to any communications between SCE&G (including its employees, agents, consultants or representative), and Westinghouse Electric Company, LLC and affiliated companies, Toshiba Corporation, the South Carolina Public Service Authority, the South Carolina Office of Regulatory Staff, regarding the revised fully resource-loaded integrated project schedule, or revised project schedule and capital cost schedule for construction of the V.C. Summer Nuclear Station, Units 2 and 3, dated or occurring on or after January 1, 2012.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

SCE&G objects to this Request as currently stated because the terms "revised fully resource-loaded integrated project schedule," "revised project schedule," and "capital cost schedule for construction" are not defined with sufficient precision to allow SCE&G to understand what documents Complainants seek and respond accordingly. SCE&G also objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to

the discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G states that, once it receives additional information and clarification from Complainants regarding the scope of this Request, it will consider producing non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 2:

All documents relating to the revised fully resource-loaded integrated project schedule, or revised project schedule and capital cost schedule for construction of the V.C. Summer Nuclear Station, Units 2 and 3, dated or occurring on or after January 1, 2012.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

SCE&G objects to this Request as currently stated because the terms “revised fully resource-loaded integrated project schedule,” “revised project schedule,” and “capital cost schedule for construction,” as well as the phrase “all documents relating to,” are not defined with sufficient precision to allow SCE&G to understand what documents Complainants seek and to respond accordingly. SCE&G also objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G’s possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G states that, once it receives additional information and clarification from Complainants regarding the scope of this Request, it will consider producing non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 3:

All documents relating to any and all assessment, analysis, evaluation or evidence bearing on the financial capacity, solvency, risk of bankruptcy, fraudulent or false accounting and financial reporting, and enforceability of contractual obligations of Westinghouse Electric Company, LLC and affiliated companies and Toshiba Corporation.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

SCE&G objects to this Request as currently stated because the terms “financial capacity,” and “enforceability of contractual obligations” are not defined with sufficient precision to allow SCE&G to understand what documents Complainants seek and to respond accordingly. SCE&G also objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G’s possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G states that, once it receives additional information and clarification from Complainants regarding the scope of this Request, it will consider producing non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 4:

All documents relating to any and all assessment, analysis, evaluation or evidence bearing on the validity or enforceability of the so-called “Fixed Price Contract” between SCE&G and Westinghouse Electric Company, LLC and affiliated companies for construction of the V.C. Summer Nuclear Station, Units 2 and 3.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

SCE&G objects to this Request as currently stated because the terms “assessment, analysis, evaluation or evidence” and the “so-called ‘Fixed Price Contract’” are not defined with sufficient precision to allow SCE&G to understand what documents Complainants seek and to respond accordingly. SCE&G also objects to this Request on the grounds that it is vague, overbroad, and

seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G states that, once it receives additional information and clarification from Complainants regarding the scope of this Request, it will consider producing non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 5:

All documents relating to any and all assessment, analysis, evaluation or evidence bearing on the prudence of completion of construction, abandonment, or replacement of V.C. Summer Nuclear Station, Units 2 and 3, with alternative energy resources.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

SCE&G objects to this Request on the grounds that, as stated, it appears to call for production of every conceivable document in SCE&G's possession relating to the construction and abandonment of V.C. Summer Nuclear Station, Units 2 and 3. The Request also appears to request documents relating to the replacement of V.C. Summer Nuclear Station, Units 2 and 3 with alternative energy sources, which has not been the subject of a specific filing by SCE&G, and thus would appear to have no relevance to this proceeding. As stated, the Request, is vague, overbroad, and seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G states that, once it receives additional information and clarification from Complainants regarding the scope of this Request, it will consider producing non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 6:

All documents relating to any and all assessment, analysis, evaluation, information available or evidence bearing on the failure by SCE&G to anticipate or avoid deviations from the Commission approved schedules, estimates, and projections or to minimize the resulting expense for construction of V.C. Summer Nuclear Station, Units 2 and 3.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

SCE&G objects to this Request as currently stated because the term “failure to avoid deviations” is not defined with sufficient precision to allow SCE&G to understand what documents Complainants seek and to respond accordingly. SCE&G also objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G’s possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G states that, once it receives additional information and clarification from Complainants regarding the scope of this Request, it will consider producing non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 7:

All documents relating to any false statement, misrepresentation or fraud regarding the so-called “Fixed Price Contract” between SCE&G and Westinghouse Electric Company, LLC and affiliated companies, the revised fully resource-loaded integrated project schedule, or revised project schedule and the capital cost schedule for construction of the V.C. Summer Nuclear Station, Units 2 and 3.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

SCE&G objects to this Request as currently stated because the terms “so-called ‘Fixed Price Contract,’” “fully resource-loaded integrated project schedule,” “revised project schedule,” and “capital cost schedule” are not defined with sufficient precision to allow SCE&G to understand

what documents Complainants seek and to respond accordingly. Moreover, as currently stated, the Request is unduly burdensome because it purports to require SCE&G to analyze all statements made by Westinghouse Electric Company, LLC “and affiliated companies” to determine whether each such statements was false, or constituted a misrepresentation or fraud. SCE&G also objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G’s possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G states that, once it receives additional information and clarification from Complainants regarding the scope of this Request, it will consider producing non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 8:

All documents relating to the Interim Assessment Agreements between SCE&G and Westinghouse Electric Company, LLC and affiliated companies, between Georgia Power Company and Westinghouse Electric Company, LLC and affiliated Companies, negotiations and agreements between SCE&G and Toshiba Corporation, and between Georgia Power Company and Toshiba Corporation regarding Westinghouse’s obligations under the EPC contracts for the Summer and Vogtle plants and Toshiba’s guarantee of Westinghouse’s obligations.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G’s possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections,

SCE&G will produce non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 9:

All documents relating to the extension of the eligibility for federal production tax credits applicable to the V.C. Summer Nuclear Station, Units 2 and 3, and the assessment or evaluation of the impact of such production tax credits on the prudence of abandonment of the Summer units.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G will produce non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 10:

All documents which were relied upon or referred to in answering the interrogatories propounded herewith.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Subject to and without waiving the Terms of Response and the General Objections, SCE&G will produce non-privileged documents in its possession responsive to this Request.

REQUEST FOR PRODUCTION NO. 11:

All documents which are intended to be offered in evidence in this proceeding as well as all drafts, notes or working papers related to evidence to be offered in this proceeding.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

SCE&G objects to this request to the extent it seeks information protected by the attorney-client and/or work product privileges. SCE&G further objects to this Request on the grounds that it is premature because SCE&G has not yet determined what documents it intends to rely upon as evidence in this proceeding. A motion to dismiss is currently pending before the Public Service Commission, and the parties are in the early stages of discovery.

INTERROGATORIES**INTERROGATORY NO. 1:**

Give the names and addresses of persons known to Respondent or its counsel to be witnesses concerning the facts of the case and indicate whether or not any written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

RESPONSE TO INTERROGATORY NO. 1:

SCE&G has not yet determined the witnesses in this case. A motion to dismiss is currently pending before the Public Service Commission, and the parties are in the early stages of discovery. SCE&G will supplement this response to provide names and addresses of witnesses it may call in this case.

INTERROGATORY NO. 2:

Set forth a list of photographs, plats, sketches or other prepared documents in possession of Respondent or its counsel that relate to the claim or defense in the case.

RESPONSE TO INTERROGATORY NO. 2:

SCE&G has not yet identified or prepared a list of photographs, plats, sketches or other documents that relate to the claim or defense in the case. A motion to dismiss is currently pending before the Public Service Commission, and the parties are in the early stages of discovery. SCE&G will supplement its responses as appropriate.

INTERROGATORY NO. 3:

List the names and address of any expert witness whom Respondent proposes to use as a witness at the trial of the case.

RESPONSE TO INTERROGATORY NO. 3:

SCE&G has not yet determined the expert witnesses in this case. A motion to dismiss is currently pending before the Public Service Commission, and the parties are in the early stages of discovery. SCE&G will supplement this response to provide names and addresses of witnesses it may call in this case.

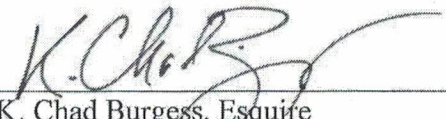
INTERROGATORY NO. 4:

For each person known to Respondent to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the important facts known or observed by such witness, or provide a copy of any written or recorded statements taken from such witness.

RESPONSE TO INTERROGATORY NO. 4:

SCE&G has not yet determined the witnesses in this case. A motion to dismiss is currently pending before the Public Service Commission, and the parties are in the early stages of discovery. SCE&G incorporates its response to Interrogatory No. 1.

This 1st day of December, 2017.



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Attorneys for South Carolina Electric & Gas
 Company

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2017-207-E**

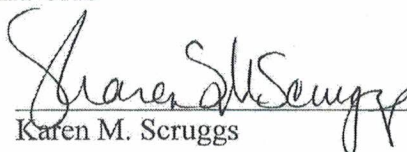
In Re: Friends of the Earth and Sierra Club,)
Complainants/Petitioners,)
)
v.)
)
South Carolina Electric & Gas Co.,)
Defendant/Respondent.)

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day, December 1, 2017, one copy of Defendant/Respondent's Responses and Objections to Complainants' First Interrogatories, Document Production Requests and Request for Entry to the persons named below at the addresses set forth via U.S. First Class Mail and electronic mail:

Robert Guild, Esq.
314 Pall Mall
Columbia, SC 29201
bguild@mindspring.com

Attorney for Complainants/Petitioners
Friends of the Earth and Sierra Club


Karen M. Scruggs

**BEFORE
THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2017-207-E**

In Re: Friends of the Earth and Sierra Club,)
Complainants/Petitioners,)
)
v.)
)
South Carolina Electric & Gas Co.,)
Defendant/Respondent.)

**DEFENDANT/RESPONDENT'S RESPONSES AND OBJECTIONS
TO COMPLAINANTS' SECOND INTERROGATORIES, DOCUMENT
PRODUCTION REQUESTS AND REQUEST FOR ENTRY**

Defendant/Respondent South Carolina Electric & Gas Co. ("SCE&G"), pursuant to Rules 33 and 34 of the South Carolina Rules of Civil Procedure and Chapter 103, Article 8 of the South Carolina Code of Regulations, serves its Responses and Objections to Complainants' Second Interrogatories, Document Production Requests and Request for Entry as follows (the "Requests").

TERMS OF RESPONSE

1. These responses reflect SCE&G's information and belief as of the date on which these responses and objections are made and may be subject to change or modification based on further discovery or on facts or circumstances which may come to SCE&G's attention at a later time. Accordingly, SCE&G reserves the right to supplement, revise, correct, clarify, or otherwise modify its responses and objections to the Requests. SCE&G also reserves the right to assert any other applicable objections to the Requests and to object to any other demands relating to the subject matter of the responses herein. SCE&G's responses to the Requests are not intended to constitute a waiver of any rights or objections.

2. By responding to the Requests, SCE&G does not concede that the Requests seek information that is relevant or admissible in the prosecution or defense of the Action. By providing

information in response to the Requests, SCE&G does not waive, and expressly reserves, all objections with respect to such information.

3. SCE&G's assertion that it will produce documents in response to a particular Request is not to be construed as an admission that any document exists within any requested category or categories, but solely as an assertion that SCE&G will produce (consistent with the objections and limitations raised herein or hereafter) any non-privileged, relevant, responsive documents or information within its possession, custody, or control that can be located after a reasonable search. SCE&G expressly reserves the right to redact irrelevant or privileged portions of documents produced in response to the Requests.

4. Certain documents in SCE&G's possession, custody, or control were obtained and are maintained by SCE&G pursuant to agreements with third parties that designate the information as confidential and proprietary and restrict SCE&G's ability to freely produce information without protections on the dissemination and use of such information. Thus, the disclosure of this information as well as other information that is non-public, confidential, sensitive, or would otherwise cause injury to SCE&G if publicly disclosed will not be produced until the parties execute a mutually agreeable protective order.

GENERAL OBJECTIONS

1. SCE&G objects to Complainants' Request that they and their agents be permitted entry upon the lands and premises which are the location of the subject facility for purposes of inspection, measuring, surveying, photographing, testing, or sampling.

2. SCE&G objects to the Requests to the extent that they seek to impose requirements or obligations different from or beyond those imposed by the South Carolina Rules of Civil Procedure and Chapter 103, Article 8 of the South Carolina Code of Regulations.

3. SCE&G objects to each definition, instruction, and Request to the extent compliance with the Request would impose an undue burden on SCE&G or compliance would be oppressive or unduly expensive, given the claims or defenses at issue in the Action.

4. SCE&G objects to the Requests to the extent that they seek documents and information not in its possession, custody or control. For purposes of its responses, it is SCE&G's position that materials in the possession of any independent, third party advisors, including its attorneys, consultants, or representatives, are not within SCE&G's possession, custody or control.

5. SCE&G objects to the Requests to the extent they seek information that is within Claimants' knowledge or possession or to which Claimants have equal access.

6. SCE&G objects to each of the Requests to the extent they seek information protected by the attorney-client privilege, the work product doctrine, the joint defense privilege, any privilege under Rule 26 of the South Carolina Rules of Civil Procedure, or any other applicable privilege. SCE&G reserves the right to waive any such privileges in the future and will notify Claimants if and when SCE&G does so. Inadvertent disclosure of any privileged or otherwise protected information shall not constitute a waiver of any claim of privilege. SCE&G hereby requests the return of any such inadvertently produced privileged information and reserves the right to object to the disclosure or use of such privileged information at any stage of these or any other proceedings.

7. SCE&G objects to the Requests to the extent they seek to impose a continuing obligation on SCE&G.

8. SCE&G objects to the Requests to the extent they seek information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence.

9. SCE&G objects to the Requests to the extent they seek information not ascertainable by a reasonably diligent search for responsive information. SCE&G objects to the Requests to the extent the Requests seek "all" documents because SCE&G cannot guarantee that it has located every single document responsive to the Request. Consistent with its obligations under the South Carolina Rules of Civil Procedure and Chapter 103, Article 8 of the South Carolina Code of Regulations, SCE&G will make a diligent, good faith search for documents and will produce responsive, non-privileged documents, to the extent they exist, and/or provide information, located in connection therewith. To that end, SCE&G is willing to meet and confer to discuss these Responses and Objections.

10. SCE&G fully incorporates its General Objections into its responses below.

SPECIFIC RESPONSES AND OBJECTIONS

REQUEST FOR PRODUCTION NO. 1:

All documents relating to the "Project Assessment Report," by Bechtel Power Corporation, dated February 5, 2016, including the original report, all documents indicating any persons or entities in receipt of copies of that report; all documents reflecting responses to or actions taken as a result of that report; all documents reflecting any consideration of the disclosure of that report or its substance to any regulatory authorities including, but not limited to the U.S Nuclear Regulatory Commission, the S.C. Office of Regulatory Staff, the S.C. Public Service Commission, the Governor of South Carolina, members of the S.C. General Assembly and to any party to proceedings before the Commission regarding the cost or schedule for the Project, including but not limited to Friends of the Earth or Sierra Club.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. SCE&G

further objects on the basis that the documents sought are protected by the attorney-client privilege and the work product doctrine.

REQUEST FOR PRODUCTION NO. 2:

All documents identified in Appendix A to the "Project Assessment Report," by Bechtel Power Corporation, dated February 5, 2016, described as "Documents Reviewed from the Owners and the Consortium," described by Bechtel reviewed during the assessment report, as well as any updates or revisions to such documents.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. SCE&G further objects on the basis that the documents sought are protected by the attorney-client privilege and the work product doctrine.

REQUEST FOR PRODUCTION NO. 3:

All documents relating to the October 22, 2016, presentation by Bechtel to "SCH, SCE&G and Santee Cooper" as referred to in the Assessment Timeline, Section 1.4 of the Bechtel Report, including any slides or other presentation materials, any notes or records prepared by persons in attendance at that presentation; and any actions taken or response to such presentation; including any consideration of the disclosure of such presentation or its substance to any regulatory authorities including, but not limited to the U.S Nuclear Regulatory Commission, the U.S. Securities and Exchange Commission, the S.C. Office of Regulatory Staff, the S.C. Public Service Commission, the Governor of South Carolina, members of the S.C. General Assembly and to any party to proceedings before the Commission regarding the cost or schedule for the Project, including but not limited to Friends of the Earth or Sierra Club.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. SCE&G

further objects on the basis that the documents sought are protected by the attorney-client privilege and the work product doctrine.

REQUEST FOR PRODUCTION NO. 4:

All documents reflecting any response by SCE&G to the "Project Assessment Report," by Bechtel Power Corporation, dated February 5, 2016, or the preliminary October 22, 2016, presentation by Bechtel to "SCH, SCE&G and Santee Cooper," or any substantive finding or observation identified in the course of the Bechtel project assessment.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. SCE&G further objects on the basis that the documents sought are protected by the attorney-client privilege and the work product doctrine.

REQUEST FOR PRODUCTION NO. 5:

All documents reflecting reports, presentations, internal communications and findings by and responses to the SCE&G-Santee Cooper "Construction Oversight Review Board" (CORB).

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G will produce non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 6:

All documents reflecting submissions to the Employee Concerns Program related to fraud, waste, construction quality, nuclear safety, and employee retaliation regarding design, procurement and construction of VC Summer Units 2 and 3.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. SCE&G also objects to the Request to the extent it seeks production of information submitted by employees with an understanding that the information submitted would remain confidential.

REQUEST FOR PRODUCTION NO. 7:

All documents relating to the August 23, 2013, letter from Lonnie Carter of Santee Cooper to Kevin Marsh, entitled "Confidential Contract negotiations," including but not limited to a copy of such document and any persons in receipt of a copy of such document and any response to the substance of such document.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G will produce non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 8:

All documents relating to the November 28, 2016 email and attachments from Lonnie Carter to Kevin Marsh — entitled “Nuclear Timelines — Project Management docx; Nuclear Timeline-Bankruptcy.docx; Securitization Assessment Nov 28 2016 doc.docx,” including but not limited to a copy of such documents and any persons in receipt of a copy of such document and any response to the substance of such documents.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G’s possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. SCE&G further objects on the basis that the documents sought are protected by the attorney-client privilege and the work product doctrine. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G will produce non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 9:

All documents relating to the May 6, 2016, SCANA-Santee Cooper letter with the subject: “V.C. Summer Units 2 and 3 Substantial Completion Dates,” including but not limited to a copy of such document, any persons in receipt of a copy of such document and any response to the substance of such document.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

SCE&G objects to this Request on the grounds that it is not aware of a May 6, 2016 letter with the subject: “V.C. Summer Units 2 and 3 Substantial Completion Dates.” It is, however, aware of a May 6, 2014 letter with that title. SCE&G also objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G’s possession, custody, or control. SCE&G further objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the

discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G will produce non-privileged documents in its possession responsive to this Request related to a May 6, 2014 letter with the subject: V.C. Summer Units 2 and 3 Substantial Completion Dates” that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 10:

All documents relating to the documents identified by Steve Byrne and Kevin Marsh in testimony at the SC Senate hearing on September 18, 2017; including, but not limited to: all “written notices of deficiencies” or “project letters” sent by SCANA/SCE&G to Westinghouse, beginning as early as 2012, expressing concern about the project; all SCANA/SCE&G “analyses” regarding project continuation or abandonment; SCANA/SCE&G “go/no-go analysis” prepared after the Westinghouse bankruptcy (March 29, 2017) to continue the project or not; any SCANA/SCE&G “annual audits” filed in the “project data base” about the project, including but not limited to any concerning Quality Assurance (QA) matters; any “analyses” or reports pertaining to costs of and steps necessary to mothball and/or secure the VC Summer construction site after project abandonment on July 31, 2017; the May 6, 2016, SCANA-Santee Cooper letter with the subject: “V.C. Summer Units 2 and 3 Substantial Completion Dates;” including but not limited to a copy of such document, any persons in receipt of a copy of such document and any response to the substance of such document.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G’s possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G will produce non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 11:

All documents produced in response to subpoenas or other legal process as reported by SCANA in its September 21, 2017, news release, “SCANA Receives Subpoena for Documents Relating to Nuclear Project;” to the United States Attorney’s Office for the District of South

Carolina; as well as documents produced in response to subpoenas or other legal process from other State or Federal authorities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 12:

All documents related to the May 7, 2012, Westinghouse document, "Westinghouse/Stone & Webster Consortium Position on the applicability of South Carolina state Professional Engineering Laws and Building Codes at V. C. Summer Units 2 & 3," including the original document, all documents indicating any persons or entities in receipt of copies of the document; all documents reflecting responses to or actions taken as a result of that document; all documents reflecting any consideration of the disclosure of that document or its substance to any regulatory authorities including, but not limited to the U.S Nuclear Regulatory Commission, the S.C. Office of Regulatory Staff, the S.C. Public Service Commission, the Governor of South Carolina, members of the S.C. General Assembly and to any party to proceedings before the Commission regarding the cost or schedule for the Project, including but not limited to Friends of the Earth or Sierra Club.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

SCE&G objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence. SCE&G further objects on the basis that the documents sought are protected by the attorney-client privilege and the work product doctrine. Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G will produce non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 13:

All documents provided in discovery or data requests to any other party including the Office of Regulatory Staff in this proceeding or in Docket No. 2017-305-E.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Subject to and without waiving these objections, the Terms of Response, and the General Objections, SCE&G will produce non-privileged documents in its possession responsive to this Request that can be located in a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 14:

All documents reflecting the consideration or decisions to withhold information, data, disclosures or evidence relating to the cost, schedule or prudence of continued construction of V.C. Summer Units 2 and 3 from regulatory authorities including, but not limited to the U.S Nuclear Regulatory Commission, the U.S. Securities and Exchange Commission, the S.C. Office of Regulatory Staff, the S.C. Public Service Commission, the Governor of South Carolina, members of the S.C. General Assembly and to any party to proceedings before the Commission regarding the cost or schedule for the Project, including but not limited to Friends of the Earth or Sierra Club; or to misrepresent or mislead these same entities regarding the cost, schedule or prudence of continued construction of V.C. Summer Units 2.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

SCE&G objects to this Request as currently stated because the term "consideration or decisions to withhold information, data, disclosures or evidence" is not defined with sufficient precision to allow SCE&G to respond. SCE&G also objects to this Request on the grounds that it is vague, overbroad, and seeks documents not within SCE&G's possession, custody, or control. SCE&G also objects to the Request to the extent it seeks information that is not relevant to the claims or defenses at issue in this Action nor is reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORIES

INTERROGATORY NO. 1:

Give the names and addresses of persons known to Respondent or its counsel to be witnesses concerning the facts of the case and indicate whether or not any written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

RESPONSE TO INTERROGATORY NO. 1:

SCE&G has not yet determined the witnesses in this case. A motion to dismiss is currently pending before the Public Service Commission, and the parties are in the early stages of discovery. SCE&G will supplement this response to provide names and addresses of witnesses it may call in this case.

INTERROGATORY NO. 2:

Set forth a list of photographs, plats, sketches or other prepared documents in possession of Respondent or its counsel that relate to the claim or defense in the case.

RESPONSE TO INTERROGATORY NO. 2:

SCE&G has not yet identified or prepared a list of photographs, plats, sketches or other documents that relate to the claim or defense in the case. A motion to dismiss is currently pending before the Public Service Commission, and the parties are in the early stages of discovery. SCE&G will supplement its responses as appropriate.

INTERROGATORY NO. 3:

List the names and address of any expert witness whom Respondent proposes to use as a witness at the trial of the case.

RESPONSE TO INTERROGATORY NO. 3:

SCE&G has not yet determined the expert witnesses in this case. A motion to dismiss is currently pending before the Public Service Commission, and the parties are in the early stages of discovery. SCE&G will supplement this response to provide names and addresses of witnesses it may call in this case.

INTERROGATORY NO. 4:


For each person known to Respondent to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the important facts known or observed by such witness, or provide a copy of any written or recorded statements taken from such witness.

RESPONSE TO INTERROGATORY NO. 4:

SCE&G has not yet determined the witnesses in this case. A motion to dismiss is currently pending before the Public Service Commission, and the parties are in the early stages of discovery.

SCE&G incorporates its response to Interrogatory No. 1.

This 1st day of December, 2017.



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Company

**BEFORE
THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2017-207-E**

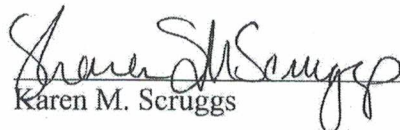
In Re: Friends of the Earth and Sierra Club,)
Complainants/Petitioners,)
)
v.)
)
South Carolina Electric & Gas Co.,)
Defendant/Respondent.)

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day, December 1, 2017, one copy of Defendant/Respondent's Responses and Objections to Complainants' Second Interrogatories, Document Production Requests and Request for Entry to the persons named below at the addresses set forth via U.S. First Class Mail and electronic mail:

Robert Guild, Esq.
314 Pall Mall
Columbia, SC 29201
bguild@mindspring.com

Attorney for Complainants/Petitioners
Friends of the Earth and Sierra Club


Karen M. Scruggs